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**U.S. EPA COMMENTS ON THE WASTE PIT AREA
STORMWATER RUNOFF CONTROL REMOVAL
ACTION PROJECT-WORK PLAN MODIFICATIONS**

DOCUMENT DATE 12-24-91



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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DEC 24 1991

REPLY TO THE ATTENTION OF:

Mr. Jack R. Craig
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

HRE-8J

RE: U.S. EPA Comments on the Waste Pit
Area Stormwater Runoff Control
Removal Action Project-Work Plan
Modifications

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Waste Pit Area Stormwater Runoff Control Removal Action Project-Work Plan Modifications.

Although the modifications to the Work Plan may not significantly impact the ultimate completion of the Removal Action the attached comments and/or actions must be completed prior to U.S. EPA's approval of the modified Work Plan.

Please contact me at (312/FTS) 886-0992 if you have any questions.

Sincerely,

James A. Saric
Remedial Project Manager

Enclosure

cc: Graham Mitchell, OEPA-SWDO
Pat Whitfield, U.S. DOE-HDQ

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ATTACHMENT A

WASTE PIT AREA STORM WATER RUNOFF
REMOVAL ACTION WORK PLAN REVIEW COMMENTS

1. DOE should present the full analytical results of the 44 samples collected during the previously conducted field activities. These must be reviewed by EPA prior to approving a work plan based on the conclusions drawn from them.
2. Page 3 of 5 in the SAP states that stock piled soils will be sampled in a manner consistent with the RI/FS quality assurance project plan (QAPP) and as supplemented by Part III of SW-846. Specific information of how Part III of SW-846 will be implemented should be provided. The size of the stock pile to be sample and the number of samples to be collected should also be provided. In addition, the average concentration should not be used to determine the disposition of the stock piled soils. Statistical methods in SW-846 should be used to determine if sufficient samples have been collected to accurately characterize the stock piles.
3. Page 3 of 5 in the SAP states that stock piled soils exhibiting concentrations of depleted uranium less than 100 pCi/g and natural thorium less than 50 pCi/g will be returned to an uncontrolled state with in the FEMP Controlled Area. This seems to be inconsistent with the interim cleanup levels presented in the SAP on page 4 of 5 as 35 pCi/g and 10 pCi/g for depleted uranium and natural thorium respectively. The stock piled soils above these interim clean up levels should be handled in such a manner that is consistent with the final remedial actions.
4. Page 4 of 5 of the SAP states that 12 additional inches of soil will continued to be removed until the average total uranium and thorium concentrations exhibited by the soil samples are less than the DOE Branch Technical Paper. The SAP should clearly state which samples are being averaged and the number of samples used in this calculation.